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Attorney for Defendant, MICHAEL VANDEVENTER

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL VANDEVENTER

Defendants.

Case No.: 1:20-cr-00206-ADA-BAM-1

Stipulation and Order To Continue Sentencing
Date

The parties to this matter, by and through their undersigned counsel, hereby stipulate as follows:

1. Sentencing in this case is currently scheduled for October 23, 2023 and the parties mutually agree to continue that proceeding as detailed below. The continuance is necessary and appropriate for the following reasons.
2. Current defense counsel first appeared on this case on April 17, 2023 after a guilty plea had been entered.

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- 1 3. Defense counsel needed to review voluminous discovery in this case before participating
2 in sentencing or any other proceedings in this case. After that review, defense counsel
3 addressed the significant difference between the Sentencing Guideline offense level
4 estimated by the parties in the previously entered plea agreement and the Guideline
5 calculation methodology and resulting offense level in the draft PreSentence Report.
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- 7 4. The parties have reached agreement on proceeding to sentencing with a revised
8 sentencing recommendation from the government agree that an Amended or
9 Supplemental PreSentence Report may be appropriate to address the revised
10 recommendation and to update the description of Mr. Vandeventer's conduct since the
11 PSR's preparation in February 2023.
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- 13 5. The parties agree to the following schedule:

Draft (Amended/Supplemental) PreSentence Report	November 13
Informal Objections	November 20
Final PreSentence Report	December 4
Formal Objections	December 11
Reply/Statement of Non-Opposition	December 18
Sentencing Date	January 8, 2024

22 It is so stipulated and agreed.

23 Dated: October 17, 2023

PHILLIP A. TALBERT,
United States Attorney

25 s/ Justin Gilio
26 Justin Gilio
27 Assistant United States Attorney

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2 Dated: October 17, 2023

Respectfully submitted,

3 s/ Kevin Rooney

4 KEVIN P. ROONEY

Attorney for Defendant,


5 MICHAEL VANDEVENTER

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7 ORDER

8 IT IS SO ORDERED, pursuant to the stipulation of the parties, that the sentencing
9 hearing in this case shall be continued from October 23, 2023 to Monday, January 8, 2024 at
10 8:30 a.m.
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14 IT IS SO ORDERED.

15 Dated: October 18, 2023

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UNITED STATES DISTRICT JUDGE